

CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
702-240-7979 • Fax 866-412-6992

PETER S. CHRISTIANSEN, ESQ.
Nevada Bar No. 5254
pete@christiansenlaw.com
KENDELEE L. WORKS, ESQ.
Nevada Bar No. 9611
kworks@christiansenlaw.com
CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
Tel: (702) 240-7979
Fax: (866) 412-6992
-and-
HOWARD L. JACOBS, ESQ.
howard.jacobs@athleteslawyer.com
Law Offices of Howard L. Jacobs
2815 Townsgate Road, Suite 200
Westlake Village, California 91361
Tel: (805) 418-9892
Fax: (805) 418-9899
Attorneys for Defendant Brock Lesnar

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARK HUNT, an individual,

Plaintiff,

vs.

ZUFFA, LLC d/b/a ULTIMATE FIGHTING
CHAMPIONSHIP, a Nevada limited liability
Company; BROCK LESNAR, an individual;
and DANA WHITE, an individual; and DOES
1-50, inclusive,

Defendants.

Case No. 2:17-cv-00085-JAD-CWH

**DEFENDANT BROCK LESNAR'S
SECOND REQUEST FOR JUDICIAL
NOTICE PURSUANT TO FEDERAL
RULES OF EVIDENCE RULE 201**

**[Filed concurrently with Defendant Brock
Lesnar's Reply in Support of Amended
Motion to Dismiss Pursuant to Fed. R. Civ.
P. 12(b)(6)]**

In support of his Reply in Support of Amended Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6), and under Federal Rules of Evidence Rule 201 (Rule 201), Defendant Brock Lesnar respectfully requests that the Court consider and take judicial notice of the following

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document as further specified in the Points and Authorities contained in Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24].

Exhibit N is a true and correct copy of a Forbes.com article entitled *UFC Vs. WWE: How Much More Is Real Fighting Worth?*, which is dated July 12, 2016, and reported the \$4 billion sale of the UFC to private investors led by WME-IMG. The sale was announced the very same weekend that Mark Hunt fought Brock Lesnar. It further documents that the UFC has seen an average growth rate of 14.6% over the past ten years. The article is publicly available at: <https://www.forbes.com/sites/chris-smith/2016/07/12/ufc-vs-wwe-how-much-more-is-real-fighting-worth/#716a01d850f0>.

For the reasons set forth in in Defendant Brock Lesnar's Request for Judicial Notice Pursuant to Federal Rules of Evidence Rule 201 [#24], Defendant respectfully requests that the Court consider and take judicial notice of this additional document when ruling on Defendant's Motion to Dismiss Plaintiff's Complaint.

RESPECTFULLY SUBMITTED this 26th day of April, 2017.

CHRISTIANSEN LAW OFFICES

By 
PETER S. CHRISTIANSEN, ESQ.
KENDELEE L. WORKS, ESQ.

-and-

HOWARD L. JACOBS, ESQ.
THE LAW OFFICES
OF HOWARD L. JACOBS
Attorneys for Defendant Brock Lesnar

CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
702-240-7979 • Fax 866-412-6992

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5 and the Court's Local Rules, the undersigned hereby certifies that on this day, April 26, 2017, a copy of the foregoing document entitled **DEFENDANT BROCK LESNAR'S SECOND REQUEST FOR JUDICIAL NOTICE PURSUANT TO FEDERAL RULES OF EVIDENCE RULE 201** was filed and served through the Court's electronic filing system (CM/ECF) upon all registered parties and their counsel.




An employee of Christiansen Law Offices

Exhibit “N”

Exhibit “N”

SportsMoney / [#SportsMoney](#)JUL 12, 2016 @ 12:06 PM **4,609** VIEWS

UFC Vs. WWE: How Much More Is Real Fighting Worth?

**Chris Smith**, FORBES STAFF *I cover the business of sports.* [FULL BIO](#) 

WWE superstar Brock Lesnar's crossover appearance at UFC 200 has further blurred the lines between what's real and fake in the combat sports niche. Yet UFC's blockbuster sale suggests the company is worth nearly three times as much as its fake wrestling counterpart. (Rey Del Rio/Getty Images)

It's the quietest week of the sports year, but that hasn't stopped UFC from making some major headlines. On Monday it was announced that UFC has been sold to [a group of firms](#) led by [WME-IMG](#) for \$4 billion. The Fertita brothers, who bought the promotion for just \$2 million in 2001, have

The sale also raises questions about just how much more valuable UFC is than WWE. The competitive sides of UFC and WWE are obviously two wildly different products; the former is a legitimate combat sport while the latter eschews real competition for scripted plotlines. But the two promotions operate in a very similar niche and the lines between them are often blurred - most recently, WWE superstar Brock Lesnar not only made a crossover appearance at UFC 200, but he took a heavyweight victory over Mark Hunt, who after the loss is still [ranked ninth-best](#) in his division.

And the two companies have remarkably similar business models. Both UFC and WWE largely generate revenue from live events, pay-per-view buys, cable TV rights deals (UFC averages \$100 million per year from Fox, while WWE has a \$150 million-per-year deal with NBCUniversal) and their respective subscription-based streaming options. And the two companies are similar in terms of total revenue, with WWE making \$659 million in 2015 to the \$600 million that Lorenzo Fertita [claimed UFC generated last year](#).

Below, which one (or multiple) facilitates global eCommerce?

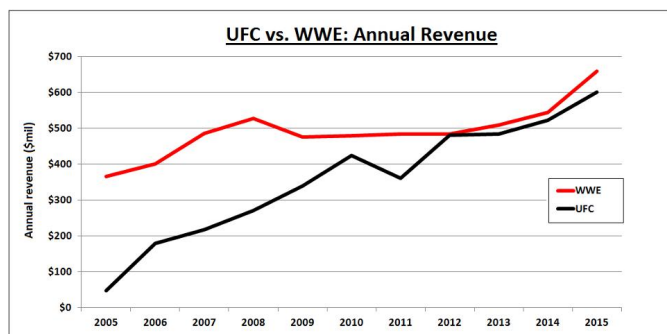
- ☐ Oracle
- ☐ UPS
- ☐ Pitney Bowes
- ☐ IBM
- ☐ Hewlett-Packard
- ☐ None of the above

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ADVERTISING

Yet UFC just sold for \$4 billion while, as of Tuesday morning, WWE's enterprise value is roughly \$1.5 billion. In other words, UFC is worth nearly three times as much as its fake-wrestling counterpart. And while WWE is trading at just over two times revenue, UFC's \$4 billion sales price means it sold at nearly seven times revenue. One potential reason why is that UFC's revenue has been growing much faster over the last decade:



Note: Annual UFC revenue figures are estimates compiled by [MMA blog Bloody Elbow](#). WWE's annual revenue figures are from SEC filings; 2005 and 2006 are for the years ending April 30, while 2007 onwards are for years ending December 31.

Since 2007, when WWE moved to a calendar fiscal year, the wrestling promotion's total revenue has grown at an average annual rate of 4.2%. UFC, meanwhile, has put up a 14.6% average annual growth rate in that same time period. And UFC has also been the more profitable of the two in recent years. Last year the fighting promotion posted an EBITDA of around \$160 million, or 27% of



PPV appearances by megastars Conor McGregor and Ronda Rousey, but according to [EBITDA estimates](#) the company has cleared \$100 million or more in pre-tax profits every year since 2009.

Another potential takeaway from the historic UFC sale is that WWE is currently undervalued at \$1.5 billion. According to one Wells Fargo analyst, the profit multiple of the UFC deal and WWE earnings projections suggest that the wrestling promotion's stock could be worth [as much as double](#) its current price.

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